



# TerraMatrix

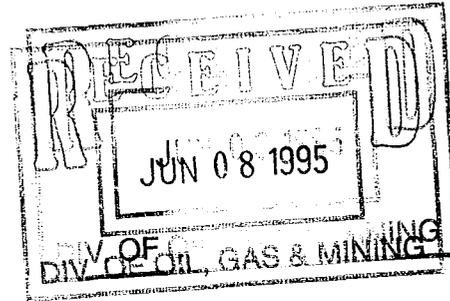
Engineering & Environmental Services

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June 7, 1995

Mr. Daron R. Haddock  
Permit Supervisor  
Utah Division of Oil, Gas and Mining  
3 Triad Center - Suite 350  
Salt Lake City, Utah 84180



07/038 #2  
cc: Steve J.  
Paul B.

Re: Cyprus Plateau Mining Company - Willow Creek Min Permit Application, Permit Completeness Responses

Dear Mr. Haddock:

We appreciate your cooperation and attention relative to the completeness review of the Willow Creek Mine permit application and wanted to respond to your initial completeness comments as outlined in your letter of June 6, 1995. The following responses address the permit completeness issues identified to date and are referenced to the outstanding completeness items as identified in your letter:

1. *Operational hydrology Information*

Response - Two copies of permit Section 4.7, Hydrologic Resource Protection and PHC, accompany these responses for insertion in Volume 3 of the UDOGM permit sets. This section presents specific operational hydrology information and details plans for protection and mitigation of surface and ground water resources.

2. *PHC information*

Response - As referenced above, Copies of Section 4.7, Hydrologic Resource Protection and PHC, accompany these response. In addition to plans for operational hydrologic protection measures, this section also identifies and describes the potential hydrologic impacts from the planned mining and related activities.

3. *The application does not list officers and directors of Cyprus Amax Minerals Company or AMAX Energy Company.*

Response - Section 2.1, Legal, Financial, Compliance, and Related Information, has been revised to address all completeness concerns identified by Mr. Paul Baker in our meeting on May 26, 1995 and two copies of the entire revised section accompany these responses for replacement in Volume 1 of the UDOGM permit sets. The revised information presented in Section 2.1 includes listings of officers and directors for Cyprus Amax Minerals Company and AMAX Energy Company as a component of Table 2.1-1, Summary of Corporate Information, on pages 2.1-11 through 2.1-13.



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4. *Map 1, showing surface land ownership, conflicts in several ways with information in the text.*

Response - Both Map 1 and the surface ownership information presented in Section 2.1.2.4, Surface and Mineral Ownership, were reviewed for consistency and any inconsistencies were corrected. The revised Section 2.1, referenced above, includes revised surface ownership information on pages 2.1-14 and 2.1-15. Two revised copies of Map 1, Surface Ownership Map, accompany these responses for replacement in Volume 4 of the UDOGM permit sets.

5. *The right of entry information appears to have some mistakes. For example, the surface lease for the preparation plant area is from AMAX Coal Company rather than Castle Gate Coal Company.*

Response - The right of entry information presented in Section 2.1.5, Right of Entry, along with other related information in Section 2.1, was submitted to Cyprus Amax Mineral Company's Legal and Lands Department for review. This review resulted in correction of any inaccuracies which have been incorporated in the revised copies of Section 2.1 which accompany these responses. It may be helpful to note that Castle Gate Coal Company and Meadowlark, Utah no longer exist as corporate entities and have been succeeded by AMAX Coal Company and AMAX Land Company, respectively.

6. *There is no Certificate of Insurance.*

Response - As noted in Section 6.2, Liability Insurance, an appropriate public liability insurance policy complying with all applicable regulatory requirements will be obtained and a copy provided for inclusion in the permit document prior to permit issuance. Discussion with Mr. Daron Haddock verified that this approach is acceptable and that the lack of a Certificate of Insurance at this time will not be considered as a permit completeness issue.

7. *A revegetation plan with proposed standards for success is needed before determining the baseline information complete.*

Response - Two copies of permit Section 5.3, Habitat Restoration Plans, accompany these responses for insertion in Volume 3 of the UDOGM permit sets. This section details plans for revegetation and habitat restoration on mining disturbance areas and specifically includes proposed revegetation success standards and criteria for measuring and evaluating revegetation success.

8. *The application contains no revegetation plan (interim or final).*

Response - As referenced above, Copies of Section 5.3, Habitat Restoration Plans, accompany these response. This section details specific revegetation plans and practices and addresses all corresponding applicable regulatory requirements.

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9. *There is no postmining land use plan.*

Response - Section 3.4, Land Use Information, and specifically Section 3.4.2, addresses land use capabilities and constraints and identifies the proposed postmining land use as wildlife habitat consistent with predisturbance use of this area. Land use planning information has been incorporated as an integral part of the operation and reclamation plan sections of the permit (Sections 4.0, Operating Plans and Design Criteria, and 5.0, Reclamation Plan) and discussions of specific operational measures to achieve the proposed postmining land use are included in these sections.

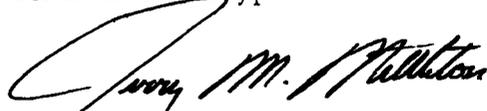
10. *The application does not describe how or whether cultural resources will be protected. (Cultural resource information should be considered confidential and removed from public review copies).*

Response - The cultural resource evaluation report included in Exhibit 8, Cultural Resource Information, provides specific information on the cultural resource values which may be effected by the planned mining and related operations and describes basic resource protection measures which may be implemented. It is important to note that CPMC has initiated consultation with the SHPO relative to site resource values and review of site evaluation information by the SHPO is currently ongoing. Consistent with applicable regulatory requirements under the National Historic Preservation Act, the SHPO, following review of relevant information will define appropriate mitigation measures for each potentially effected resource site or individual resource values. Upon receipt of the SHPO's determination and mitigation recommendations, a mitigation plan will be developed and submitted to UDOGM for insertion in Exhibit 8.

We hope that these responses and the accompanying materials address the outstanding permit completeness concerns. In addition to the items noted in the responses, we are also including with this submittal copies of those maps which have been certified by CPMC (Maps 10, 12, 13A through 13D, 14A through 14E, 19A through 19D, and 20). Copies of remaining certified maps (Maps 15, 16, 17, 18, 21, 22, 23A through 23F, 24, 25, 26, 27, 28, and 29) will be submitted under separate cover along with a new volume (Volume 15) containing all confidential permit information within the next few days. Please feel free to contact me with any questions relative to this submittal or any other permit information. Your continued cooperation and timely review are appreciated.

Sincerely,

TerraMatrix for Cyprus Plateau Mining Company



Jerry M. Nettleton

JMN:cmc  
encl.

cc: Ben Grimes/CPMC